



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
1625 HOLLYWOOD DRIVE  
JACKSON, TENNESSEE 38305-4316  
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283**

**December 23, 2014**

**Julie Duncan, Sustainability Officer  
ABB Inc.  
1133 South Cavalier Drive  
Alamo, Tennessee 38001-3813**

**REF: Compliance Evaluation Inspection  
Tennessee Stormwater Multi-sector General Permit  
TNR051468  
Crockett County**

**Dear Ms. Duncan,**

**On Thursday, December 18, 2014, I visited with you for the purpose of conducting a Compliance Evaluation Inspection (CEI) to determine your facility's compliance status related to the State's Tennessee Stormwater Multi-sector General Permit (TMSP), specifically for your site, permit number TNR051468.**

**My findings during this inspection were essentially a mirror image of my March 3, 2010, compliance inspection.**

**The following is an overview summary of this inspection:**

- 1. As in 2010, ABB's SWPPP was found to be a very well written document and properly executed should provide continued TMSP compliance in the future for ABB, Inc.**
- 2. It was noted that all quarterly visual inspections had been completed during the 2013 sampling year. Surprisingly to this inspector, only the fourth quarter of 2014 had been conducted during the 2014 sampling year.**
- 3. Detailed inspections are currently conducted twice weekly of all site facilities that would impact stormwater quality and ABB's SPCC plan. These twice weekly forms do not fit the typical layout of what is considered an "Annual Comprehensive Inspection" form but this inspector is of the opinion that ABB is exceeding the intent of the Annual Comprehensive Inspection format and any one inspection can be considered an "Annual Comprehensive" inspection. Based on this observation, credit is given for meeting the "Annual Comprehensive" inspection requirement of the permit.**

4. Stormwater training was found to be conducted twice a year, double the permit requirement. This practice is to be commended.
5. A drain inlet directly east of the east loading dock was found to be filled with a sandy looking material to the point that the direction of flow could not be visually determined. A review of the SWPPP indicates this to be a direct violation of Section 8.1 of your SWPPP.
6. The fact that ABB, Inc. has two stormwater control swales was noted in the March 3, 2010, CEI letter. Since that is still true, it merits mentioning again. These swales allow for visual observations of the water quality prior to release. This is an excellent Best Management Practice (BMP) and worth noting again.

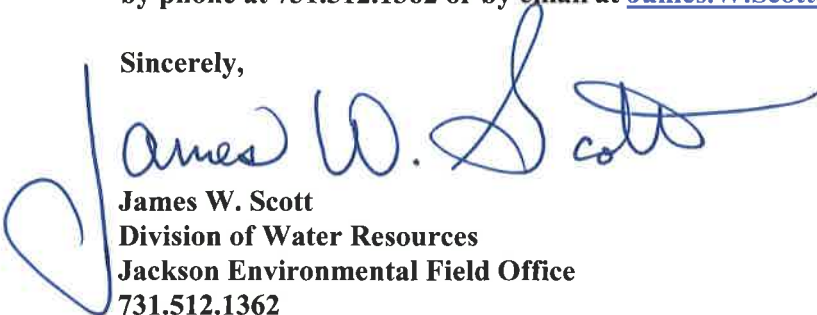
**ACTION ITEMS:**

1. Please address and clean-out the one drain inlet noted in this inspection letter. Should there be other inlets that are un-noted, please check and maintain as required by ABB's SWPPP.
2. Please take whatever steps that are needed to make sure that the required "Quarterly Visual" samples are faithfully completed, documented and the inspection forms are available for future inspections.

Overall, ABB, Inc. has a very good stormwater program and it is the desire of the State's Division of Water Resources that ABB, Inc. will continue to exceed the minimum requirements of the TMSP Permit.

I appreciate the courtesy shown to me during this inspection. If you have any questions concerning my visit, this letter or any other issue that you think I could assist you with, feel free to contact me by phone at 731.512.1362 or by email at [James.W.Scott@tn.gov](mailto:James.W.Scott@tn.gov).

Sincerely,



James W. Scott  
Division of Water Resources  
Jackson Environmental Field Office  
731.512.1362

Cc Rodney Brooks, General Manager  
ABB, Inc.  
1133 South Cavalier Drive  
Alamo, Tennessee 38001-3813



TDEC - Division of Water Resources  
Jackson Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TNR051468	Facility Site Name	ABB Power T & D		
		Address	1128 South Cavalier Drive, Alamo, Tennessee 38001-3813		
Permit Eff. Date:	07.08.2009	Permit Exp Date:	05.14.2014	SIC Code:	3612

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	12/18/2014 8:50	Exit Date/Time (mm/dd/yyyy hh:mm):	12/18/2014 10:00
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Facility Representatives

Julie Duncan, Sustainability Officer, 731.696.5361	Rodney Brooks/ Plant Manager/ 731.696.5224
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)		

Compliance Monitoring Reason:	Random Inspection		
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:	3
		Hours:	
Inspection Type:	State	Compliance Monitoring Action Outcome:	No Violation
Lead Agency:	State	Compliance Monitoring Rating Code:	Satisfactory
If Joint Inspection, what was the purpose of the other party?			

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

(1) The facility is inspected in detail twice a week with documentation. (2) All of 2013 Quarterly Visual Inspections were completed and on file. During 2014, only the 4th Quarter Visual inspection was completed and documented. (3) Employees are trained 2 times a year on storm water and their SPCC plan. (4) A drain inlet due east of the east loading dock was found to be filled with a sandy looking material to the point that the direction of flow could not be determined. There SWPPP states that this situation should not develop (Section 8.1).

EPA and State Representatives

James W. Scott	Division of Water Resources/ JEFO/ 731.512.1362	12/18/2014
Inspector's Signature	Agency / Office / Phone	Date
Conner Seabolt	Division of Water Resources/ JEFO/ 731.512.1302	12/19/14
Manager's Signature	Agency / Office / Phone	Date

<h1>TDEC</h1>	<h2>TMSP-Industrial Storm Water Inspection Form</h2>	<b>Water Pollution Control Division Jackson Field Office</b>
<b>FACILITY DATA</b>		
NAME OF FACILITY INSPECTED <b>ABB Power T &amp; D</b>	INSPECTION DATE <b>12.18.2014</b>	TIME ENTRY / TIME EXIT <b>0850/1000</b>
		TMSP TRACKING NUMBER <b>TNR051468</b>
LOCATION OF FACILITY <b>1128 South Cavalier Drive Alamo, TN 38001-3813</b>	MAILING ADDRESS OF FACILITY <b>SAME</b>	EFFECTIVE DATE <b>07.08.2009</b>
		EXPIRATION DATE <b>05.14.2014</b>
FACILITY CONTACT/ TITLE / PHONE <b>Julie Duncan/Sustainability Officer/731.696.5361</b>	RESPONSIBLE OFFICIAL/ TITLE / PHONE <b>Rodney Brooks /General Manager/ 731.696.5224</b>	
INDUSTRIAL ACTIVITY DESCRIPTION <b>Power, Distribution, and Specialty Transformers</b>		
SIC CODE(S) 3612	LATITUDE: <b>35.7792</b>	LONGITUDE: <b>-89.128094</b>
SECTOR(S): <b>AC      </b>		
WATERSHED: <b>8010205. (2016). Forked Deer-South Fork</b>	RECEIVING STREAM: <b>Kail Creek</b>	
303d LISTED: <b>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></b>	TMDL: <b>YES <input type="checkbox"/> N/A <input checked="" type="checkbox"/></b>	SECTION 313: <b>YES <input type="checkbox"/> NO <input type="checkbox"/></b>
		TE LISTED: <b>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></b>
MS4 DISCHARGE: <b>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></b>		
<b>MONITORING AND REPORTING</b>		
<b>VISUAL EXAMS – ALL TMSP FACILITIES REQUIRED TO PERFORM</b>		
PERFORMED:	(Had all 4 quarters of 2013, only the 4 <sup>th</sup> quarter of 2014)	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
FREQUENCY:	*1/QTR	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
STORM EVENT:	*0.1" @ 72 HRS & W/I 30 MINUTES	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
OBSERVATIONS:	*DOCUMENTED	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
RECORDS:	*KEEP W/I SWPPP	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
ANALYTICAL MONITORING REQUIRED: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		
NONE REQUIRED		
PARAMETER	NUMERICAL LIMIT mg/L Table:	FREQUENCY:
		CUT-OFF mg/L Table:
		FREQUENCY: Annually
SAMPLES COLLECTED:	(NA)	
STORM EVENT:	YES <input type="checkbox"/> NO <input type="checkbox"/>	
SAMPLE TYPE:	YES <input type="checkbox"/> NO <input type="checkbox"/>	
REPRESENTATIVE:	YES <input type="checkbox"/> NO <input type="checkbox"/>	
EX. CUT-OFF LIMITS:	YES <input type="checkbox"/> NO <input type="checkbox"/>	

RECORDS:	*RETAINED FOR MINIMUM OF 3 YRS.	NA	YES <input type="checkbox"/> NO <input type="checkbox"/>
REPORT SUBMITTED:	*PM NLT MARCH	NA	YES <input type="checkbox"/> NO <input type="checkbox"/>

<b>TMSP-Industrial Storm Water Inspection Form</b> <b>(Continued)</b>			
FACILITY: ABB Power T & D		TRACKING NO.: <u>TNR051468</u>	DATE: 12.18.2014

ANALYTICAL MONITORING (continued from Page 1)			
<u>SWPPP CONTENT</u>			

SWPPP PREPARED		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
PP TEAM:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
SOURCES LIST:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
DRAINAGE MAP:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
EXPOSED MTLs.:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
SPILLS/LEAKS:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
MEAS. & CONTROLS:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
HOUSEKEEPING:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
PREV. MAIN.:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
SPCC:	(It is a separate document)	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
INSPECTIONS:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
TRAINING:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
NON-SW CERT.:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
SED./EROS. CON.:	(They mainly use vegetation to stabilize)	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
RUNOFF MGMT.:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
UPDATED PLAN:		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
COMP. SITE EVAL.	*1/YR	YES <input type="checkbox"/> NO <input type="checkbox"/>

\* DENOTES TMSP REQUIREMENT

<u>OBSERVATIONS &amp; COMMENTS</u>		
INDIVIDUAL(s) CONTACTED:	OTHER DWPC PERSONNEL PRESENT:	
Julie Duncan		

WEATHER CONDITIONS:	Overcast/ Cool/ Wet	SAMPLES: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	PHOTOS TAKEN: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
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**OBSERVATIONS & COMMENTS**

(Continued from Page 2)

**FACILITY: ABB POWER T & D****TRACKING No.: TNR0051468****DATE: 12.18.2014**

1. The facility is inspected in detail twice a week with documentations. **NOTE: This form is so detailed that any one inspection sheet could serve as their Annual Comprehensive Inspection.**
2. All of 2013 Quarterly Visual Inspections were completed and on file. During 2014, only the 4<sup>th</sup> Quarter Visual inspection was completed and documented.
3. Employees are trained 2 times a year on stormwater and SPCC.
4. A drain inlet due east of the east loading dock was found to be filled with a sandy looking material to the point that the direction of flow could not be determined. This is a violation of their SWPPP, Section 8.1.

**NAME/TITLE AND SIGNATURE OF PRIMARY INSPECTOR****James W. Scott**  
**AGENCY / DIVISION / OFFICE / PHONE AND FAX NUMBERS****TDEC / DWPC / JFO  
(731) 512-1362 / (FAX) (731) 661-6283****DATE****12.18.2014**